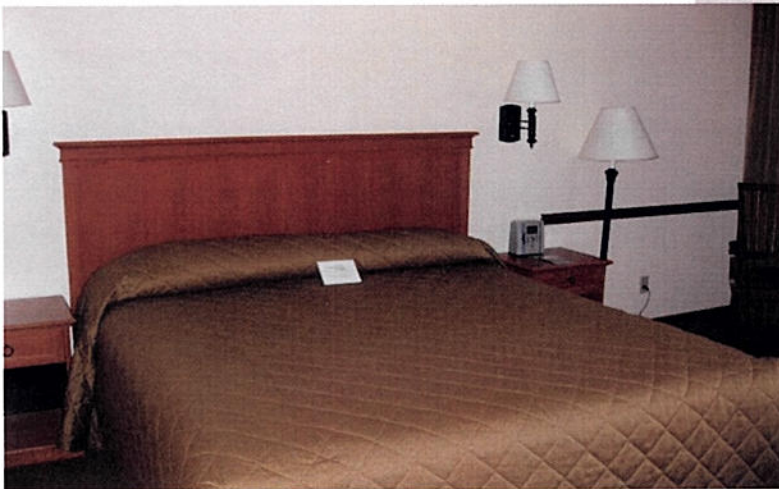


GLEN CANYON NATIONAL RECREATION AREA

LODGING COMPARABILITY STUDY



AUGUST/SEPTEMBER 2009

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I. INTRODUCTION

2009 LODGING COMPARABILITY ANALYSIS GLEN CANYON NATIONAL RECREATION AREA

The following lodging comparability analysis was completed by Business Management to obtain a base for future rate requests/approvals for lodging operations.

During the weeks August 17 & August 31, 2009, representatives from the National Park Service (NPS) and ARAMARK Lake Powell Resorts and Marinas, (ARAMARK) visited lodging facilities in Arizona and Utah. The potential comparable lodging facilities were determined jointly by the NPS and ARAMARK officials prior to the on-site visits.

The survey team consisted of the following individuals:

Julie Drugatz, Uplake/Antelope Point Concessions Specialist, Glen Canyon NRA
Jacki Blais, Downlake Concessions Specialist, Glen Canyon NRA
Karen Rinker, Rate Coordinator, ARAMARK

This comparability analysis and survey was compiled in accordance with the National Park Service Concessions Management Improvement Act of 1998, P.L. 105-391, 112 Stat. 3596, 16 U.S.C. which states:

Sec. 406. Reasonableness of Rates.

Sec. (a). Each concession contract shall permit the concessioner to set reasonable and appropriate rates and charges for facilities, goods, and services provided to the public, subject to approval under subsection (b).

Sec. (b). A concessioner's rates and charges to the public shall be subject to approval by the Secretary. The approval process utilized by the secretary shall be as prompt and as unburdensome to the concessioner as possible and shall rely on market forces to establish reasonableness or rates and charges to the maximum extent practicable. The Secretary shall approve rates and charges that the Secretary determines to be reasonable and appropriate. Unless otherwise provided in the contract, the reasonableness and appropriateness of rates and charges shall be determined primarily by comparison with those rates and charges for facilities, goods, and services of comparable character under similar conditions, with due consideration to the following factors and other factors deemed relevant by the Secretary: length of season, peak loads, average percentage of occupancy, accessibility, availability and costs of labor and materials, and type of patronage. Such rates and charges may not exceed the market rates and charges for comparable facilities, goods, and services, after taking into account the factors referred to in the preceding sentence.

In addition, the 2006 National Park Service Management Policies, Chapter 10, provides the following guidance:

10.2.4.7 Rates.

The National Park Service must approve all rates charged to visitors by concessioner. The reasonableness of a concessioner's rates and charges to the public will, unless otherwise provided in the contract, be judged primarily on the basis of comparison with current rates and charges for facilities and services of comparable character under similar conditions. Due consideration will be given to length of season, provision of peak loads, average percentage of occupancy, accessibility, availability and costs of labor and materials, type of patronage and other factors deemed significant by the Director.

There are six rate approval methods that the Superintendent may use when reviewing a concessioner's rate request. Each of these methods conforms to and is in compliance with the Concessions Policy Act of 1998 (PL 105-391). The rate approval method used for this survey is the Direct Comparability Method.

The Direct Comparability Method consists of two processes; the Full Review and the Limited Review. The Full Review is the process used for this comparability survey and required on-site collection of information from businesses identified as potential comparables and most similar to the concession operations. This information was analyzed and the properties determined to be most similar will be used as actual comparables in the assessment of concessioner's rate requests.

On-site visits to collect information included the following potential comparable lodging facilities:

1. Hampton Inn	Kayenta, AZ	www.hampton.com
2. Holiday Inn	Kayenta, AZ	www.holiday-in.com/kayentaaz
3. Goulding's Lodge	Monument Valley, UT	www.gouldings.com
4. Greenwell Inn (BW)	Moab, UT	www.greenwellinmoab.com
5. Aarchway Inn	Moab, UT	www.aarchwayinn.com
6. Big Horn Lodge	Moab, UT	www.bighornmoab.com
7. Sandstone Inn	Torrey, UT	www.sandstonecapitolreef.com
8. Capitol Reef Resort (BW)	Torrey, UT	www.bestwestern.com
9. Bryce Canyon Resort	Bryce, UT	www.brycecanyonresort.com
10. Cameron Trading Post	Cameron, AZ	www.camerontradingpost.com

II. SELECTION OF COMPARABLES METHODOLOGY

As directed by Director's Order NPS-48 4.3 Rate Approval Program, a list of criteria was used to determine which of the facilities visited would be selected as most similar/comparable to the concessioner's lodging operations. These criteria have numeric values when added together support decisions in determining the most similar/comparable facilities. After the actual comparables are identified, further analysis will consider Extra Quality Features (EQF) to determine where the concessioner fits among the comparable properties lodging operations and range of rates.

CRITERIA

- 1. Competition**
- 2. Seasonality**
- 3. Similar Area**
- 4. Similar Clientele**
- 5. Occupancy Rate**
- 6. Facility Characteristics**
- 7. Similar Size**

Also included is a review of EQF's. These are additional features/attributes that add merit, but are not assigned a numeric value. EQF's are not intended to be used in the process of selecting actual comparables but only to analyze the variables between the concessioners and comparables.

Facility Related

Rooms

- Compliance – ADA Requirements

TV

- Free Cable

Telephones

- Free Local Calls/800 Calls

Internet

- Wireless
- Free Internet Access

Vending

- Common Area

Retail Facilities

Restaurant – Bar

- Full Service Dining Room

Marina/Beach

Service Related

- Make Other Reservations
- Registration Office Open 24 Hours

Local Factors

- Greening Amenities
- Recycling Programs
- In-Room Coffee
- Ironing Board/Iron
- Hair Dryers
- Microwave
- ATM
- In-Room Refrigerator
- Cancellation Policy (72 hours)
- Pet Policy

III. ANALYSIS AND DETERMINATION

The following lodging facilities were selected based on the criteria as the most similar/comparable to the concessioner, ARAMARK Lake Powell Resorts & Marinas operations. All selections were determined under the Direct Comparability/Full Review and Competitive Market Declaration processes requiring the National Park Service to collect information/documentation from businesses located outside of the recreation/park area.

Bullfrog Marina – Defiance House Lodge (Comparability)

Prior to selection of the study area or selection of potential comparable properties the concessioner and representatives from NPS completed a Rating Criteria Guide in accordance to the *Concession Management Rate Administration Guide April 2009* to be used by the study team members for the unbiased evaluation of each potential comparable. Upon completion of the property review process, all rating sheets were reviewed and calculated with a score assigned to each operation. Four Defiance House lodging comparables fell below the desirable cut-off of 65 points and six comparables remained ranging from 70 to 67 criteria points. For all practical purposes one criteria factor “Similar Size” was the element that separated operations to be used in this 2009 Lodging Comparability Study. The operations to be used for this full review and future simplified reviews of operations and rate analysis are Hampton Inn, Kayenta AZ; Goulding’s Lodge, Monument Valley, UT; BW Greenwell and Bighorn Lodge, Moab, UT; Sandstone Inn, Torrey, UT; and Cameron Trading Post, Cameron, AZ.

Lake Powell Resort (Competitive Market Declaration)

In following the guidance provided in the *Concession Management Rate Administration Guide*, we have determined that a competitive market for overnight accommodations exists for the concessioner’s lodging operations.

Lake Powell Resort Overnight Accommodations Competitive Market Declaration.

Overnight accommodations provided by ARAMARK (Lake Powell Resort) in Glen Canyon National Recreation Area are vended in a competitive market. The rates charged by the concessioner for overnight accommodations at the Lake Powell Resort are negotiated between buyer and seller. In consideration of these factors, it is declared that rates charged by the concessioner are comparable and approved. The concessioner may price lodging rates competitively without further approval from the National Park Service. **(See Competitive Market Declaration under section D in this study)**

A. CONCESSIONER

Lake Powell Resorts & Marinas

**LAKE POWELL RESORTS & MARINAS managed by ARAMARK SPORTS
AND ENTERTAINMENT SERVICES, INC.**

Bullfrog Marina
P.O. Box 4055
Bullfrog, Utah, 84533
Phone: 435-684-3032
Fax: 435-684-3114
Reservations: 800-528-6154

www.lakepowell.com

Bullfrog Marina offers overnight accommodations (lodge rooms and family units), fuel, full service marina, boat moorage, retail outlets, campground and RV park, food and beverage services, boat rentals, and ferry service. The lodge has 48 rooms, a gift shop and outside deck areas. In-room amenities include a refrigerator, microwave, flat screen TV, coffee maker, DVD player, hair dryer, etc.



Lake Powell Resort
P.O. Box 1597
Page, Arizona 86040
Phone: 928-645-1125
Fax: 928-645-1031
Reservations: 800-528-6154

www.lakepowell.com



Lake Powell Resorts and Marinas provides the following visitor services within Glen Canyon National Recreation Area: overnight accommodations, food and beverage services, retail outlets, full marina services, water-based fuel and moorage, marina stores, campground/RV Park, boat tours, gas station, and boat rentals. The Lake Powell Resort is a full service resort with 348 guest rooms, fitness room, spa, two outdoor swimming pools,

dining room, lounge, Java City Coffee, gift shop, and meeting rooms. The resort offers a mix of traditional rooms, deluxe rooms and suites to accommodate visitors. In-room amenities include hair dryer, refrigerator, coffee/coffee maker, iron/ironing board, etc.



Hampton Inn
US Highway 160
P.O. Box 1219
Kayenta, Arizona 86033
Telephone: 928-697-3170
Fax: 928-697-3189
Reservations: 1- 800-hampton
(800-426-7866)

www.monumentvalleyonline.com

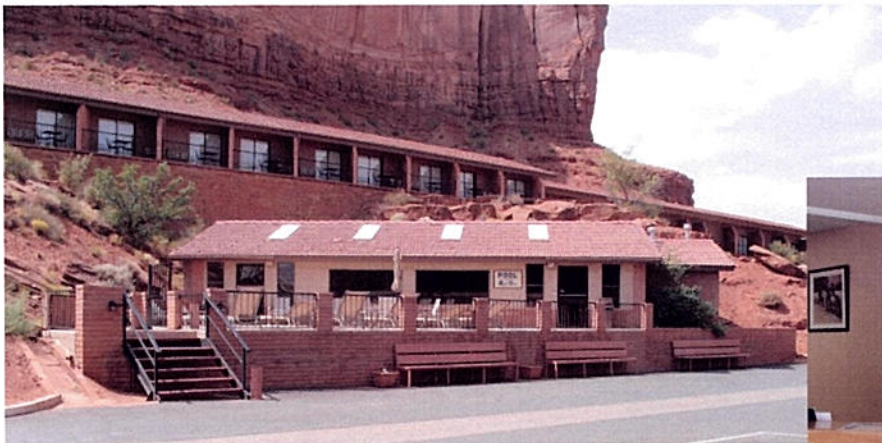
The Kayenta Hampton Inn offers 73 lodging rooms, outdoor heated pool, Reuben Heflin Restaurant, Kayenta Trading Company gift shop, free hot deluxe continental breakfast, and other amenities. The lodging room amenities include free wireless high speed Internet connection, guest laundry, free in-room movie channels and HBO, free local and 800 calls, coffee/coffee maker, etc.



Goulding's Lodge
P.O. Box 360001
Monument Valley, Utah 84536
Telephone: 435-727-3231
Fax: 435-727-3344

www.gouldings.com

The Goulding's Lodge, open year-round, is located just inside the Arizona/Utah border adjacent to the Navajo Tribal Park in Monument Valley, Utah. Goulding's offers lodging (60 rooms and 8 apartments for families), dining, gift shop, convenience store, gas station, campground services, museum, heated in-door swimming pool, and other amenities. The Southwestern style guest room amenities include in-room coffee maker, refrigerator, hair dryer, iron/ironing board, cable TV & DVD player, etc.



Bryce Canyon Resort
P.O. Box 640006
139 West US Highway 12
Bryce, Utah 84764
Telephone: 435-834-5351
Fax: 435-834-5256
Reservations: 800-834-0043

www.brycecanyonresort.com



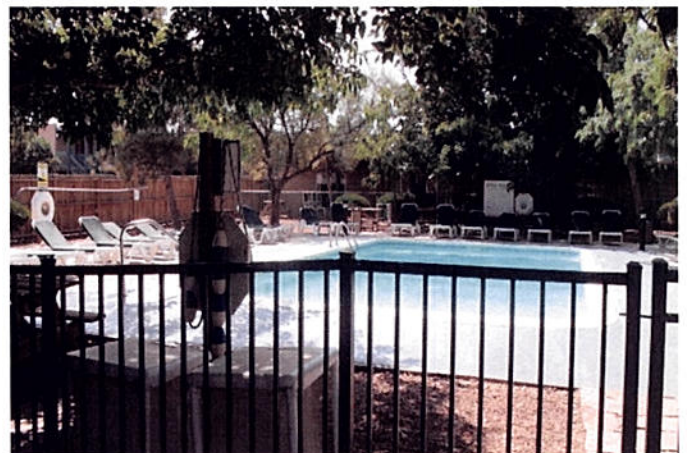
Bryce Canyon Resort offers a mix of guest rooms, suites and rustic cottages/cabins with kitchenettes (70 rooms), indoor swimming pool, two restaurants on site, etc. In-room amenities include cable TV, hair dryers, complimentary high-speed Internet access, hair dryer, individually controlled AC/heat, iron/ironing board, microwave and/or refrigerator (on request), etc.



**Holiday Inn – Monument Valley
Junction US Highway 160 & 163
P.O. Box 307
Kayenta, Arizona 86033
Telephone: 9298-697-3221
Fax: 928-697-3349
Reservations: 1-800-HOLIDAY (800-465-4329)**

www.holidayinnkayenta.com

The Holiday Inn offers 163 guest rooms, a full service restaurant featuring both authentic Native American Cuisine and Traditional American, in-room dining, gift shop, fitness center, guest laundry, heated outdoor swimming pool, and other amenities. The guest room amenities include in-room coffee makers, iron/ironing board, hairdryers, cable TV, etc.



Sandstone Inn
955 E. SR 24
P.O. Box 750208
Torrey, Utah 84775
Telephone: 435-425-3775
Fax: 435-425-3212
Reservations: 800-458-0216

www.sandstonecapitolreef.com

The Sandstone Inn guest services include 50 guest rooms, a full-service restaurant, complimentary coffee at restaurant, in-door heated pool & spa, banquet/conference facilities and other amenities. The in-room amenities include free high-speed Internet access, honeymoon suite with a Jacuzzi tub, queen or king beds, refrigerator, microwave, etc.



Best Western Greenwell Inn
105 S. Main Street
Moab, Utah 84532
Telephone: 435-259-6151
Fax: 435-259-4397

www.greenwellinnmoab.com

The Greenwell Inn located in downtown Moab, Utah offers 72 guest rooms and one suite. Complimentary lobby coffee bar is available to provide a pick-me-up any time of day. Other amenities offered include an outdoor heated pool, full-sized spa, fitness center, guest laundry, free local calls, in-room coffee, refrigerator, microwave, etc.



2009 LODGING COMPARABILITY STUDY - DEFIANCE HOUSE

The following criteria are used to determine comparability when using the direct full review approval method of rate approval.

COMPARABLE OPERATIONS	Defiance House	Hampton Inn Kayenta	Holiday Inn Kayenta	Goulding's Lodge	Greenwell (BW) Moab	Aarchway Motel	Big Horn Lodge	Sandstone Inn	BW Capitol Reef	Bryce Cyn Resort	Cameron Trading Post
1. COMPETITION (10)	10	10	10	10	10	10	10	10	10	10	10
2. SEASONALITY Year Round Operation (10) Seasonal Close (5)	10	10	10	10	10	10	10	10	10	10	10
3. SIMILAR AREA Destination (10) Rural (5) Urban (3)	10	10	10	10	10	10	10	10	10	10	10
4. SIMILAR CLIENTELE Vacationing Public (10) Business/Corporate (5)	10	10	10	10	10	10	10	10	10	10	10
5. OCCUPANCY RATE 85% or More (10) 84%-70% (5) 69% or less (3)	10	10	10	10	10	10	10	10	10	5	10
6. FACILITY CHARACTERISTICS Building Type Low Rise Two Story (3) High Rise 3+ Story (2) Single Story (1) Age of Facility 1984 & newer (3) 1960-1983 (2) 1959 and older (1) Construction Type Frame Wood (4) Masonry/Steel (2) Other (1)	3	2	3	3	3	3	3	3	3	3	2
	3	3	2	3	2	3	2	3	3	2	2
	4	2	4	4	4	4	4	4	4	4	4
7. SIMILAR SIZE 10 - 75 Rooms (10) 76 - 100 Rooms (5) Over 100 Rooms (3)	10	10	3	10	10	5	10	10	3	10	10
TOTAL CRITERIA POINTS	70	67	62	70	69	65	69	70	63	64	68

2009 LODGING COMPARABILITY STUDY - DEFIANCE HOUSE

COMPARABLE OPERATIONS	Defiance House	Hampton Inn Kayenta	Holiday Inn Kayenta	Goulding's Lodge	Greenwell (BW) Moab	Aarchway Motel	Big Horn Lodge	Sandstone Inn	BW Capitol Reef	Bryce Cyn Resort	Cameron Trading Post
EXTRA QUALITY FEATURES											
ROOMS											
COMPLIANCE - ADA REQUIRE	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
TV											
FREE CABLE	✓										
TELEPHONES											
FREE LOCAL CALLS/800 CALLS											
INTERNET											
FREE INTERNET ACCESS											
WIRELESS											
VENDING											
COMMON AREA	✓										
RETAIL FACILITIES	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
RESTAURANT - BAR											
FULL SERVICE DINING ROOM	✓	✓	✓	✓			✓	✓	✓	✓	✓
MARINA/BEACH	✓										
SERVICE RELATED											
MAKE OTHER RESERVATIONS	✓										
RESERVATION 24 HOURS	✓										
LOCAL FACTORS											
GREENING AMENITIES	✓										
RECYCLING PROGRAMS	✓										
IN-ROOM COFFEE	✓										
IRONING BOARD/IRON	✓										
HAIR DRYERS	✓										
MICROWAVE	✓										
ATM	✓										
IN-ROOM REFRIGERATOR	✓										
CANCELLATION POLICY - 72 HOURS	✓										
PETS ALLOWED/POLICY	✓										

COMPARABLES KEY

1. Hampton Inn - Kayenta
2. Holiday Inn - Kayenta
3. Goulding's Lodge - Monument Valley
4. Best Western Greenwell Inn - Moab
5. Aarchway Inn - Moab
6. Big Horn Lodge - Moab
7. Sandstone Inn - Torrey
8. Best Western Capitol Reef Resort - Torrey
9. Bryce Canyon Resort - Bryce
10. Cameron Trading Post - Cameron

Lake Powell Resort (Competitive Market Declaration)

ARAMARK Lake Powell Resort & Marinas (ARAMARK) provides overnight accommodations at the Lake Powell Resort. Overnight accommodation options are also offered/provided by businesses in the city of Page, Arizona. The Lake Powell Resort competes for lodging customers with the following businesses:

- Courtyard by Marriott
- Best Western Arizona Inn
- Best Western at Lake Powell
- Quality Inn – Lake Powell
- Travelodge
- Page Boy Motel
- America's Best Value Inn
- Lake Powell Days Inn & Suites
- Holiday Inn Express
- Motel 6
- Super 8 Motel
- Lake Powell International Hostel
- Budget Host inn
- Rodeway Inn

In following the guidance provided in the *Concession Management Rate Administration Guide*, we have determined that a competitive market for overnight accommodations exists for the concessioner's lodging operations.

Use of a competitive market declaration for approving rates for overnight accommodations will be authorized. Rates can be adjusted without the specific approval of the Superintendent, but they are subject to review to ensure that they remain reasonable in comparison to the services offered by the other businesses.

This declaration will be reviewed annually and the use of this method can be rescinded if the Superintendent determines that situations have changed. This decision to change rate approval methods is at the discretion of the Superintendent.

Lake Powell Resort Overnight Accommodations Competitive Market Declaration.

Overnight accommodations provided by ARAMARK (Lake Powell Resort) in Glen Canyon National Recreation Area are vended in a competitive market. The rates charged by the concessioner for overnight accommodations at the Lake Powell Resort are negotiated between buyer and seller. In consideration of these factors, it is declared that rates charged by the concessioner are comparable and approved. The concessioner may price lodging rates competitively without further approval from the National Park Service.

Aarchway Inn
1551 N. Highway 191
Moab, Utah 84532
Telephone: 435-259-2599
Fax: 435-259-2270
Reservations: 800-341-9359

www.aarchwayinn.com

The Aarchway Inn offers 97 guest rooms including triple queen rooms and suites. Other amenities include a banquet/meeting room, complimentary hot breakfast, exercise room, shuttle service, indoor hot tub, heated outdoor pool, etc. In-room amenities include microwave, refrigerator, coffee maker, hair dryer, iron/ironing board, wireless internet, etc.



Big Horn Lodge
550 South Main Street
Moab, Utah 84532
Telephone: 435-259-6171
Fax: 435-259-

www.bighornmoab.com

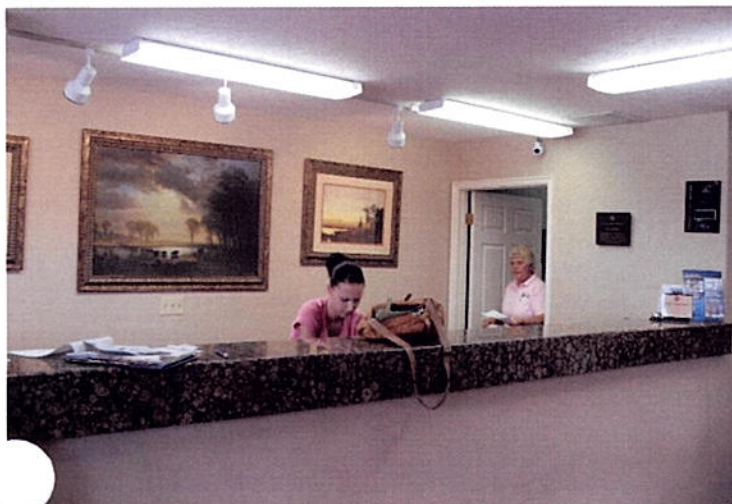
The Big Horn Lodge offers 60 guestrooms, restaurant, outdoor pool, etc. In-room amenities include high speed Internet, satellite/cable TV, hair dryer, coffee/tea maker, microwave, refrigerator, iron/ironing board, etc.



Best Western Capitol Reef
2600 E. Highway 24
Torrey, Utah 84775
Telephone: 435-425-3761
Fax: 435-425-3300
Reservations: 800-780-7234

www.bestwestern.com

Best Western Capitol Reef Resort offers 104 guest rooms, restaurant, heated outdoor pool, hot tub, tennis/basketball courts, guest laundry, gift shop, etc. In-room amenities include king or queen beds, cable satellite TV with HBO, free high-speed Internet access, iron/ironing board, etc.



Cameron Trading Post
P.O. Box 339
Cameron, Arizona 86020
Telephone: 928-679-2231
Fax: 928-679-2350
Reservations: 800-338-7385

www.camerontradingpost.com

Historic Cameron Trading Post offers guest rooms (luxury suites, double and single rooms), gift shop, full service restaurant, Native American art gallery, market, gas station, etc. In-room amenities include cable TV, coffee maker, wireless Internet access, etc.

